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3M Environmental, Health and Safety Operations

3M Center, Building 0224-05-W-03
St. Paul, MN 55144-1000

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Certified Mail

February 6, 2013

NO CBI

Document Processing Center
EPA East – Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxics, U.S. EPA
1200 Pennsylvania Avenue NW
Washington, DC 20460-0001

Re: TSCA 8(e) Substantial Risk Notice on CAS 375-03-1; 1,1,1,2,2,3,3-heptafluoro-3-methoxypropane; Docket number 8EHQ-0608-17181A

To whom it may concern:

In June of 2008, 3M notified the EPA of results from an acute toxicity study in daphnia magna performed on CAS 375-03-1; 1,1,1,2,2,3,3-heptafluoro-3-methoxypropane. A 48h-EC50 of 0.74 mg/l was determined in this study, with 0% immobility at 0.65 mg/l and 100% immobility at 0.84 mg/l. These effects were observed within 24 hours of exposure. Subsequent toxicity studies on this compound, however, have provided reasons to doubt the validity of these results.

The purpose of the current submission is to inform the EPA of results of a second acute toxicity study in daphnia magna, where no toxicity to daphnia was observed following 48 hr of exposure to a mean measured concentration of 1.3 mg/L (highest soluble concentration).

3M concludes that the results of the 2008 study should be disregarded, as it is 3M's opinion that the results stemmed from super saturated solutions created from the column saturation technique used in the 2008 study.

If you have any questions or would like any additional information, please contact Deanna Luebker, 3M TSCA 8(e) Coordinator, at (651) 737-1374 or djluebker@mmm.com.

Sincerely,

Jean B. Sweeney (DL)

Jean B. Sweeney
Staff Vice President, 3M Environmental, Health and Safety Operations

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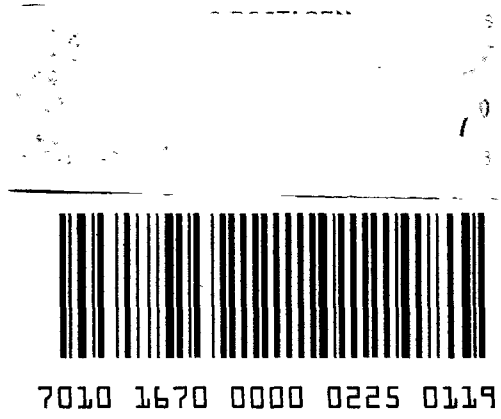

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